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Zuffa, LLC

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

17 MOISES REZA, FRANK GARZA, TANNER  
PENDERGRAFT, and FEDERICO  
18 NAVARRETE on behalf of themselves and all  
others similarly situated,

19 Plaintiffs,

20 | vs.

21 ZUFFA, LLC, a Nevada limited liability  
22 company; NEULION USA, LLC, a Delaware  
limited liability company; and DOES 1 to 50,  
inclusive,

Defendants.

### *Related actions:*

25 | Garcia v. Zuffa, LLC, No. 2:23-cv-01211-  
26 | JAD-VCF (D. Nev.)

27 | Sanchez v. Zuffa, LLC, No. 2:23-cv-01259-JAD-VCF (D. Nev.)

Case No.: 2:23-cv-00802-CDS-EJY

**REPLY IN SUPPORT OF DEFENDANT  
ZUFFA, LLC'S MOTION TO  
CONSOLIDATE**

*ORAL ARGUMENT REQUESTED*

1           On August 25, 2023, Defendant Zuffa, LLC (“Zuffa”) filed and served its Motion to  
 2 Consolidate the related cases of *Reza, et. al. v. Zuffa, LLC, et al.*, Case No. 2:23-cv-00802-CDS-EJY  
 3 with *Garcia v. Zuffa, LLC*, No. 2:23-cv-01211-JAD-VCF and *Sanchez v. Zuffa, LLC*, No. 2:23-cv-  
 4 01259-JAD-VCF. *See Reza*, ECF No. 67 (“Motion to Consolidate Cases”); *Garcia*, ECF No. 14  
 5 (“Notice of Filed Motion to Consolidate Related Cases”); *Sanchez*, ECF No. 22 (“Notice of Filed  
 6 Motion to Consolidate Related Cases”)

7           To date, none of the Plaintiffs in any of the related actions has filed a response to Zuffa’s  
 8 Motion to Consolidate. Pursuant to Local Rule 7-2(b), Plaintiffs had fourteen (14) days to respond to  
 9 Zuffa’s motion. LR 7-2 (“For all other motions, the deadline to file and serve any points and  
 10 authorities in response to the motion is 14 days after service.”). Thus, the deadline for any of the  
 11 Plaintiffs to file a response was September 8, 2023. The response deadline has now passed with no  
 12 responses filed by any of the Plaintiffs. Local Rule 7-2(d) states that the “failure of an opposing party  
 13 to file points and authorities in response to any motion, except for a motion under Fed. R. Civ. P. 56  
 14 or a motion for attorney’s fees, constitutes a consent to the granting of the motion.” LR 7-2(d)  
 15 (emphasis added).

16           Because Plaintiffs in each of the related actions have failed to file a response to Zuffa’s Motion  
 17 to Consolidate, they therefore consent to the granting of the motion. Therefore, for this additional  
 18 reason and for the reasons stated in Zuffa’s original motion, the Motion to Consolidate should be  
 19 granted and the Court should order consolidation of the three above-captioned putative class actions  
 20 pursuant to Rule 42(a) of the Federal Rules of Civil Procedure and Local Rule 42-1(b) and for all  
 21 other relief this Court may deem just and proper.

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 28           //

1 Dated: September 15, 2023

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of September, 2023, I caused true and correct copies of the foregoing Reply in Support of Zuffa, LLC's Motion to Consolidate to be serviced via the United States District Court CM/ECF system on all parties or persons requiring notice.

/s/Reena Kaur  
Reena Kaur, an employee of Holland & Knight LLP

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